

EX PARTE OR LATE FILED

January 11, 1994

Mr. William F. Canton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED

FEB 23 1994

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

Re: CC Docket no. 93-292

Dear Mr. Canton:

I am a telecommunications professional who is responsible for my company's telecommunication systems and I am painfully aware that although I may reduce the risk, no matter how many steps I take to secure my systems, I am still vulnerable to toll fraud. That is why I am so encouraged by the proposed rule making.

PBX owners should not be responsible for 100% of toll fraud if we are not controlling 100% of our destiny. This destiny is ultimately controlled by not only our implementation and proper use of PBX security features but by the information, equipment and services provided by IXCs, LECs and CPE vendors. The legal obligations of the IXCs, LECs and CPE vendors should provide the proper incentive to reduce and eliminate all toll fraud.

Current programs offered by some IXCs (Sprint Guard™, MCI Detect™, and AT&T Netprotect™) and insurance companies are too expensive. Monitoring and proper notification by the IXCs must be a part of the basic interexchange service offerings. This should eliminate cases of toll fraud greater than 24 hours.

LECs must also provide monitoring and proper notification as a part of their basic service offerings. Local lines are as vulnerable to toll fraud. As the line between IXC and LEC becomes fuzzier, monitoring and proper notification by all carriers will be even more applicable.

No. of Copies rec'd
List ABCDE

Aug

CPE vendors need to provide telecommunications security as a cost of doing business instead of an opportunity to sell additional products and services. CPE vendors should be required to provide warnings about the risks of toll fraud, as it specifically relates to their equipment and provide solutions to reduce the risk of toll fraud. All CPE should be delivered without standard default passwords, which are well known to the criminal community. All login IDs, including those used by the vendor, should be disclosed at the time of purchase and at installation. All customer passwords should be changed or created at installation and the customer should receive written assurance that all vendor passwords will meet minimum requirements regarding length, change schedule, and alpha numeric format. CPE vendors should be encouraged to offer security related hardware and software in the price of their systems.

The provisions outlined in the NPRM are fair and equitable. Shared liability will require clearly defining the responsibilities of the;

- CPE owner to secure their equipment
- CPE vendors to warn customers of the specific toll fraud risks associated with their equipment
- IXC's and LEC's to offer detection, notification, prevention, and education offerings and services

If toll fraud occurs due to the negligence of one or more parties then the financial loss should be equitably distributed among those negligent parties. If there is no proven negligence the financial loss should be equitably distributed among CPE owner, and all CPE vendor(s), LEC(s) and IXC(s) involved.

Toll Fraud is a financially devastating problem that affects the entire telecommunications industry including users, vendors and carriers. I am sure, that if we all work together we can and will make a positive impact on this problem.

Sincerely,



Rodney T. TIONGSON
Operations Manager
DIAFA-Mattress



EX PARTE OR LATE FILED

RECEIVED

FEB 23 1994

FCC MAIL ROOM

Feb. 8 1994
DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Common Carrier Bureau
1919 M St. NW
Washington, DC 20554

RE: FCC Docket Number 93-292
"Policies & Rules regarding Toll Fraud"

Dear Mr. Caton:

I'm pleased to see the FCC addressing the toll fraud problem that exist through hardware on the customer premise as well as the circuits that exist to the carrier through this equipment.

Your proposed rule making as defined by the summary of this docket does not address the responsibilities as I believe they should. We at CSX Transportation understand the capabilities of the telephone equipment purchased by us to provide our phone service. Requiring the manufacturer to inform us of the risks of toll fraud through this equipment is of no value to us today.

I believe the programs the carriers have in place today are a good start by them to do something about the liability to the users of their service. The area the FCC should address in this rule making process is putting responsibility on the carrier to protect the customer from abuse. They should be forced to monitor the usage from their users and detect abnormal calling patterns and either restrict the calling or inform the user of the calls. The user could then request a restriction of the calls until the source of the abuse is corrected. There should be a maximum limit of liability for the customer .

The carriers do this in the calling card service area and should do the same for dedicated service customers.

Sincerely,

John Brockett
John Brockett
Assistant Vice President
Telecommunication

No. of Copies rec'd
List ABCDE

Miss